



**MCI Telecommunications
Corporation**

1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

October 30, 1995

Mr. William Caton
Acting Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

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OCT 30 1995

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

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Re: In the Matter of End User Common Line Charges,
Comments on Non-Traffic Sensitive Cost Data Submitted
by the Bell Operating Companies (BOCs), CC Docket No.
95-72, DA 95-2089

Dear Mr. Caton:

Enclosed herewith for filing are the original and four (4) copies of MCI Telecommunications Corporation's Comments, regarding the above-captioned matter.

Please acknowledge receipt by affixing an appropriate notation on the copy of the MCI Comments, furnished for such purpose and remit same to the bearer.

Sincerely,

Christopher Bennett
Senior Staff Member

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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OFFICE OF SECRETARY

In the Matter of:)
)
End User Common Line Charges,)
Comments on Non-Traffic)
Sensitive Cost Data Submitted)
by the Bell Operating)
Companies (BOCs))
_____)

CC Docket No. 95-72

COMMENTS

MCI Telecommunications Corporation (MCI), pursuant to Sections 1.415 and 1.419 of the Commission's Rules, submits its comments in the above-captioned matter.¹ Based on the information provided by the Bell Operating Companies (BOCs), both Integrated Services Digital Network (ISDN) loops and standard loops should bear a single end user common line (EUCL) charge.

NTS comparisons indicate ISDN and standard EUCL charges should be the same

The responses from the five BOCs unanimously showed that the difference between the NTS costs of ISDN loops and

¹ Pleading Cycle Established for Comments on Non-Traffic Sensitive Cost Data Submitted by the BOCs, CC Docket No. 95-72, DA 95-2089, released October 2, 1995 (NTS Comments Public Notice) (extended October 11, 1995); and In the Matter of Amendment of Part 36 of the, Commission's Rules and Establishment of a Joint Board, Notice of Proposed Rulemaking, CC Docket No. 80-286, FCC 95-189, released May 15, 1995 (NPRM).

standard loops is nominal.² The average percentage NTS cost difference was 11 percent -- representing the amount by which ISDN basic rate interface (BRI) type loops exceeded the NTS cost of standard loops.³ Also, Ameritech made a specific comparison of digital trunk and primary rate interface (PRI) and found that there was no difference in NTS costs.⁴ Both the ISDN BRI-to-standard loop and ISDN PRI-to-digital PBX trunk comparisons indicate that one EUCL charge should be applied per facility.

Certain BOCs seek to deregulate themselves with baseless confidential cover claims

Southwestern Bell claimed confidential cover for all of its NTS data and did not file it on the public record --

² See Ameritech Response showing basic analog NTS common line costs as \$5.51 per month compared to \$5.89 per month for ISDN BRI (pages 1 and 2 of attachments); Bell Atlantic Response showing standard line NTS loop costs as \$14.56 versus \$16.77 for Basic Rate ISDN (attachment page 1); NYNEX Response showing single channel link costs ranging from \$16.08-\$34.54 and ISDN BRI link cost as \$18.24 (page 3); Pacific Bell Response showing single channel interstate monthly cost per access line as \$5.41 for single channel produce compared to \$6.09 for BRI ISDN (Attachment 1); and US WEST single channel services average NTS of \$17.34 versus \$18.52 for multi-channel services (5th attached page).

³ For individual BOCs the amount by which the ISDN BRI loop NTS exceeded those of the standard loop is:

	Bell		Pacific	
<u>Ameritech</u>	<u>Atlantic</u>	<u>NYNEX</u>	<u>Bell</u>	<u>US WEST</u>
6.9%	15.2%	13.4%	12.6%	6.8%

⁴ See Ameritech Response, *supra* note 2, p. 3.

contradicting the Commission's express instructions in this proceeding.⁵ Southwestern Bell does not provide any evidence proving its claim of ISDN competition in its region. Unsubstantiated BOC confidential cover claims are attempts at self-deregulation. The Commission should not allow any BOC confidential cover claims based upon competition until the Commission has put in place a process to allow the public to review, and if necessary, challenge those claims.

⁵ Southwestern Bell Response, *supra* note 2, p. 1. The Commission asked BOCs to submit NTS comparative data and asked the public to comment on such submissions. The Commission obviously desired the cost data to be filed on the public record, since it asked for comments on such data.

MCI continues to support one EUCL charge for both ISDN loops and standard loops facilities. Additionally, MCI reiterates its support for the Commission's view that interexchange carrier access charges should not increase as a result of this proceeding. Finally, MCI asks the Commission to reject any BOC claim for confidential cover, until the Commission has implemented a process to allow the public to review and comment upon such BOC claims.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

BY: 

Christopher Bennett
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1801 Pennsylvania Avenue, NW
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(202) 887-2402

Dated: October 30, 1995

STATEMENT OF VERIFICATION

I have read the foregoing, and to the best of my knowledge, information, and belief there is good ground to support it, and that it is not interposed for delay. I verify under penalty of perjury that the foregoing is true and correct. Executed on October 30, 1995.

A handwritten signature in cursive script, appearing to read "Chris Bennett", written over a horizontal line.

Christopher Bennett
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CERTIFICATE OF SERVICE

I, Stan Miller, do hereby certify that copies of the foregoing Comments, were sent via first class mail, postage paid, to the following on this 30th day of October 1995.

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